



**ADAMS COUNTY COMMUNICATION CENTER, INC.**

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May 14, 2012

VIA ECFS

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

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**RE: Ex Parte Presentation  
PS Docket No 12-94**

**In the matter of the Transition Process for 700 MHZ Public Safety Broadband Waiver Recipients.**

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Dear Ms. Dortch:

On Friday, May 11, 2012, William Malone, Walter Leslie, and Scott lane representing The Adams County Communication Center, Inc. (Adcom911, Inc., Adams County, Colorado) participated in a telephone conference call with Jennifer Manner, Brian Hurley, and Erika Olsen of the Public Safety and Homeland Security Bureau.

The purpose of the call was to further clarify our response comments to DA12-555, "In the Matter of the Transition Process for 700 MHZ Public Safety Broadband Waiver Recipients."

Adcom911, Inc. has carefully considered the position we find ourselves in as an early builder, a waiver recipient and a BTOP grant recipient. As stated in our filed comments, Adcom 911, Inc is in favor of transferring our current Long Term De Facto Transfer Spectrum Lease Agreement from the PSST to FirstNet. We believe this will have no negative affects on the construction of a National Public Safety Broadband Network. We recognize that FirstNet has an enormous task in front of it. They must first develop a working structure, they will have extensive information to review from several public safety advisory groups, they will need to develop a project plan and schedule for developing an RFP/s, the RFP/s will need to be issued, received, reviewed and awarded. All of these things will take time. During that time the public safety broadband spectrum will not be in use.

Since the extent of this time factor is not yet known early builders such as Adcom911, Inc. should be to proceed with their deployments. The information gathered during this early deployment could be valuable to FirstNet. Adcom911, Inc. also realizes that Adcom911, Inc. could incur additional expenses to integrate the Adcom911, Inc. Ran with the FirstNet network design.

Adcom911, Inc. believes it would be in the public interest to extend the current lease for the following reasons:

1. Although Adcom911, Inc. has always presented a Service Availability Date in the spring of 2013, our infrastructure build out is well underway and scheduled to be completed by August of 2012.
2. Adcom911, Inc. has scheduled extensive testing to be accomplished between August and the Service availability date in the spring of 2013.
3. Adcom911, Inc. has currently purchased our entire infrastructure, both Core and RAN Equipment.
4. The EPC installation is completed.
5. Currently we have four (4) enodeB sites installed and have applied for an STA covering a total of 24 enodeBs, to allow our continued installation and testing.
6. To not allow Adcom911, Inc. to continue to use the spectrum and test our network would result in public grant funds having been expended without any benefits to the public.

Prior to the enactment of the "MIDDLE CLASS TAX RELIEF AND JOB CREATION ACT OF 2012 " Adcom911, Inc. has been collaborating with other major municipality interests in the Denver, Colorado region, to develop a business model and governance structure to allow for expansion of the current Adcom911, Inc. investment. A significant effort has been expended and progress is being made by all the agencies involved in this collaboration.

In Summary Adcom911, Inc. requests that the current leases be extended for agencies such as ours that have already committed significant resources to building and testing public safety wireless broadband networks. Should the Commission decides not to extend any leases, we highly encourage the commission to issue Special Temporary Authorizations allowing operation of these initial networks until such time as FirstNet begins constructions in these areas.

Sincerely,



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